

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**GOOGLE LLC’S FIRST STATUS REPORT
REGARDING DOCUMENT REVIEW AND PRODUCTION**

Pursuant to the Court’s order of September 15, 2023, ECF No. 440, Google LLC (“Google”) submits this report regarding the status of the review and production of documents impacted by the ingestion site issue (the “Impacted Documents”), *see* ECF No. 422.

After an internal analysis that has been scrutinized by outside counsel, Google has identified approximately 16 million Impacted Documents. *See* Sheff Decl. ¶ 22, ECF No. 422-1.

Based on information provided by Google’s outside e-discovery vendor, as of 3:30 pm ET on September 15, 2023, Google has exported approximately 11.9 million of the Impacted Documents from its ingestion sites to its vendor for processing and deduplication (the “Exported Documents”).

Of the Exported Documents, approximately 10.1 million documents have been loaded by the vendor for deduplication. Of those 10.1 million, 6.873 million are duplicates. There are 3.281 million non-duplicates (the “Review Population”). Google anticipates that the Review Population will grow as the vendor continues to process and deduplicate the documents exported from

ingestion sites. As of 3:30 pm ET on September 15, 2023, the average deduplication rate for the portion of the Impacted Documents that have been processed and de-duplicated is 67.69%. That average rate may change as additional documents are processed.

Google has retained over 700 contract attorneys to review the Review Population and has reviewed approximately 1.6 million of those documents as of September 15, 2023. Previously in this litigation, Google had used 480 reviewers, but additional reviewers have been retained to speed up this production.

Since September 8, 2023, Google has made the following document productions:

- On September 14, 2023, Google produced 285,699 documents.

Dated: September 15, 2023

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